

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

Grady Clifford Smith,

Plaintiff,

vs.

Civil Action No.:

**Hyundai Motor Manufacturing
Alabama, LLC,**

2:06-cv-745-WKW-CSC

Defendant.

REPORT OF PARTIES' RULE 26 PLANNING MEETING

Pursuant to Fed R. Civ. P. 26(f), the parties discussed and agreed to the following schedule for discovery and trial:

1. Pre-Discovery Disclosures. Defendant proposes that the parties will exchange within 30 days of the meeting the information required by Rule 26.

2. Discovery Plan. Defendant proposes the following discovery plan:

- a. Discovery will be needed on Plaintiff's claims and Defendant's defenses.
- b. All discovery commenced in time to be completed by July 31, 2007.
- c. The parties request a maximum of 25 interrogatories by each party to any other party.

Responses due 30 days after service.

- d. The parties request a maximum of 25 Requests for Production.

Responses due 30 days after service.

- e. The parties request a maximum of 15 Requests for Admission.

Responses due 30 days after service.

- f. The parties request a maximum of 8 depositions by each party.
- g. Each deposition limited to maximum of 7 hours unless extended by agreement of parties.
- h. Reports from retained experts under Rule 26(a)(2) due: from Plaintiff by April 15, 2007; from Defendant by May 15, 2007.
- i. Supplementation under Rule 26(e) due 30 days after receipt of information and last supplementation 30 days before the close of discovery.

3. Other items. The parties do not request a conference with the Court before entry of the Scheduling Order.

- a. The parties request a pretrial conference in October 2007.
- b. The Plaintiff should be allowed until January 15, 2007, to join additional parties and amend the pleadings.

The Defendant should be allowed until February 15, 2007, to join additional parties and amend the pleadings.
- c. All potentially dispositive motions should be filed by July 15, 2007.
- d. Settlement cannot be evaluated prior to the commencement of discovery.
- e. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due three weeks before trial.
- f. Parties should have 10 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).
- g. The case should be ready for trial by the scheduled trial term beginning December 10, 2007, in Montgomery, Alabama and at

this time is expected to take approximately three days.

DATED this 3rd day of October, 2006.

THIS WILL CERTIFY THAT ALL PARTIES HAVE AGREED TO THE ABOVE AND HAVE AGREED THAT SANDRA B. REISS WILL E-FILE THE FOREGOING REPORT OF PARTIES' PLANNING MEETING. SPECIFICALLY, THE ABOVE IS AGREED TO BY:

FOR PLAINTIFF

/s/Cynthia Wilkinson(with permission)

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FOR DEFENDANT

/s/Sandra B. Reiss

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